

PRC Environmental Management, Inc.

1099 18th Street
Suite 1960
Denver, CO 80202
303-295-1101
FAX #303-295-2818

Planning Research Corporation

September 27, 1990

~~Mr. Martin Hestmark~~
U.S. Environmental Protection Agency
999 18th Street
Denver, Colorado 80202

RE: Review of 881 Hillside Restoration Phase 1-B Documents

Dear Martin:

The U.S. Environmental Protection Agency (EPA) requested that PRC Environmental Management, Inc. (PRC) review the Rocky Flats Plant 881 Hillside restoration Phase 1-B project management plan, work procedures, quality assurance project plan, and site specific health and safety plan for construction. EPA transmitted the Phase 1-B documents to PRC on September 7, 1990. PRC reviewed and commented on the documents under the Technical Enforcement Support (TES) 12 contract no. 68-W9-0009, work assignment no. C08054.

The specific comments listed below address technical and editorial issues. The specific comments are keyed and structured according to the 881 Hillside restoration Phase 1-B documents.

PROJECT MANAGEMENT PLAN

Page ii, Table of Contents: The title of Figure 2 in the table of contents should be changed to "Management System 881 Hillside IRA-Phase 1-B".

Rationale: The title for Figure 2 in the table of contents is inconsistent with the actual title on Figure 2.

Page 2, Table 1: The milestones "Perform Pre-Start-Up Readiness Review" and "EPA/CDH Review" should be switched.

Rationale: The milestones should be switched to appear in chronological order and to be consistent with the other milestones listed in the table.

Page 9, Figure 2: The correct spelling and initials of Mr. McInroy's name should be verified.

Rationale: It appears that the quality assurance officer's name is misspelled. Figure 1 lists it as L. C. McInroy, while Figure 2 lists it as L. M Inroy.

ADMIN RECORD

Page 10, Section 6: Weekly progress reports should be included in this section if they are going to be required for Phase 1-B construction.

Rationale: The Phase 1-A project management plan states weekly progress reports will be required for Phase 1-A construction.

CONSTRUCTION WORK PROCEDURES

Signature Page: The correct spelling and initials of Mr. McInroy's name should be verified.

~~Rationale: The spelling and initials of Mr. McInroy's name are not consistent throughout the 881 Hillside restoration Phase 1-B documents.~~

Prerequisites, Item 2: This document should clearly state whether EG&G's, UNC Geotech's (UNC), or both project managers have control of monitoring the soil moisture and dust suppression activities.

Rationale: The quality assurance project plan states the EG&G project manager is responsible for monitoring soil moisture and dust suppression activities. Item 2 of this section states these activities are under the direction of UNC project manager. One project manager needs to be identified for this activity to establish the proper chain of command.

Response Action (RA) Contractor Equipment: Some type of soil moisture testing equipment (such as a Speedie moisture meter) should be included in the RA contractor equipment list.

Rationale: Soil moisture testing and monitoring are required activities during the construction phase. A soil moisture testing device will be needed to verify soil moisture content.

Work Procedures, Items 9 through 19: A statement should be added indicating the soil moisture must be verified by the project manager to be above 15 percent and that soil wetting may be required to prevent dust resuspension during these activities.

Rationale: Verification by the project manager that the soil moisture is above 15 percent and that soil wetting may be required to prevent dust resuspension are applicable work procedures for items 9 through 19.

QUALITY ASSURANCE PROJECT PLAN

Signature Page: The correct spelling and initials of Mr. McInroy's name should be verified.

Rationale: The spelling and initials of Mr. McInroy's are not consistent throughout the 881 Hillside restoration Phase 1-B documents.

SITE SPECIFIC HEALTH AND SAFETY PLAN

Section 1.5.1: The site specific health and safety plan (HSP) indicates soil moisture will be maintained at a minimum of 15 percent during construction activities. The method of determining soil moisture content and the frequency of the soil moisture measurements should be included in the HSP.

Rationale: This information should be present in the HSP for reference by personnel in the field.

Section 1.5.1: The HSP states excavation activities will cease when wind speeds exceed 15 miles per hour (mph) for two consecutive 15-minute intervals. A 35-mph peak wind speed criterion will also be used for shutdown of all field activities during Phase 1-B activities.

Rationale: A peak wind speed at 35 mph is used as an alert or shutdown criterion for all field activities at Rocky Flats.

Section 1.5.1: Startup criteria should be listed for activities that have been shutdown because the wind speed was greater than allowable work limits.

Rationale: Shutdown criteria for excessive wind speeds have been documented in the text. ~~However, it is unclear when activities may be resumed. Startup criteria should be well documented.~~

Section 8.1.2: It is recommended that UNC personnel, other subcontractors, and visitors will be required to wear radiation dosimeter badges while they are at the Rocky Flats site.

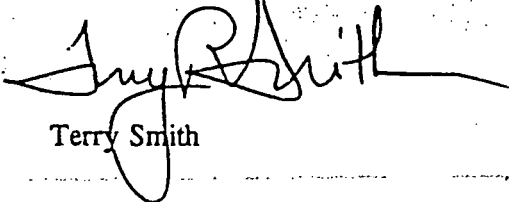
Rationale: Dosimeter badges will provide information on personnel radiation exposure.

Section 10.1: Equipment requiring decontamination should be listed in this section. In addition, UNC desktop decontamination manuals or any other procedural manuals referenced in the HSP should be available for reference at the site.

Rationale: The above information must be present at the site for ease of reference during work activities.

Sincerely,

PRC ENVIRONMENTAL MANAGEMENT, INC.



Terry Smith

cc: Josh Marvil, PRC
Jim Wulff, PRC
PRC file